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LAW OFFICES
HALEY BADER & POTTS P.L.C.

4330 North Fairfax Dr., Suite 900

Arlington, Virginia 22203-1633

Telephone (703) 841-0606

FAX (703) 841-2343

E-mail: haleytp@haleytp.com

NOV - 3 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Rafael G. Prohias
ADMITTED IN VA AND FL

E-Mail Address:
rprohias@haleytp.com

November 3, 1997

Our File No.
1199-104-63

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

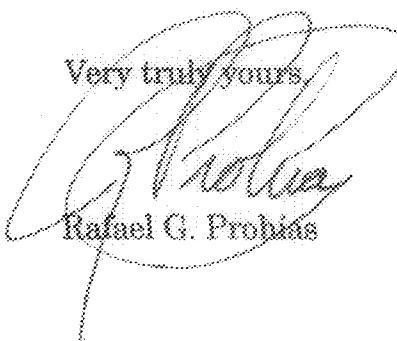
Re: Petition for Rulemaking
MM Docket No. 97-200
RM-9144

Dear Mr. Caton:

Transmitted herewith on behalf of Gary N. Petersen and Alpine Broadcasting Limited Partnership is an original and four copies of its Comments and Counterproposal in connection with the above-referenced rulemaking proceeding.

Kindly communicate any questions regarding this matter directly to this office.

Very truly yours,


Rafael G. Prohias

RGP/ned
Enclosures: (5)

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Before the
Federal Communications Commission

Washington, D.C. 20554

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In The Matter Of

Amendment of Section 73.202(b)
Table of Allotments,
FM Broadcast Stations
Ashton, Idaho

)
MM Docket No. 97-200
RM-9144

NOV - 3 1997

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

**Comments and Counterproposal
of Petersen/Alpine**

By *Petition for Rulemaking*, Mountain Tower Broadcasting requested the Commission institute a rulemaking proceeding to amend Section 73.202(b), the FM Table of Allotments, by allotting Channel 224A to Ashton, Idaho as that community's first local aural transmission service. In response, the Commission released a *Notice of Proposed Rulemaking* ("NPRM"), proposing the requested changes to the Table of Allotments and soliciting submission of comments by November 3, 1997. See *NPRM*, MM Docket No. 97-200, RM-9144, DA 97-1943 (released September 12, 1997).

Gary N. Petersen, permittee of radio station KWWF(FM), West Yellowstone, Montana ("KWWF"), and Alpine Broadcasting Limited Partnership, the Commission-approved assignee of KWWF¹, through counsel, hereby jointly

¹ File No. BAPR-970822EC, granted on October 10, 1997. Closing is presently scheduled for December 5, 1997.

submit its Comments in response to the *NPRM*, and submit a Counterproposal to the Petition for Rulemaking.² Specifically, Petersen/Alpine request that the Commission allocate Channel 243A, in lieu of Channel 224A, at Ashton, Idaho, substitute Channel 225C for Channel 243A at West Yellowstone, Montana, and modify the construction permit for KWWF accordingly. In support thereof, the following is submitted:

I. **PETERSEN/ALPINE'S COUNTERPROPOSAL.**

KWWF is currently authorized to operate on Channel 243A pursuant to construction permit BPH-941122ML. A license application to cover the construction permit is currently pending before the Commission. See BLH-960220KB.

In the instant *NPRM*, the Commission proposes to allocate Channel 224A to Ashton, Idaho with a site restriction of 9.1 kilometers northwest of the community utilizing reference coordinates North Latitude 44° 08' 10" and West Longitude 111° 30' 57". *NPRM*, at para. 2.

As demonstrated in the Engineering Statement and the attached exhibits appended hereto as *Exhibit A*, the allocation of Channel 243A in lieu of Channel 224A to Ashton, Idaho would remove the site restriction required pursuant to the *NPRM*, and would meet the minimum distance separation

² Mr. Petersen and Alpine Broadcasting Ltd. will hereinafter be jointly referred to as "Petersen/Alpine."

requirements pursuant to Section 73.207 of the Commission's Rules from the reference point for Ashton, Idaho. *Engineering Statement*, p. 1.

In addition, the substitution of Channel 225C for Channel 243A in West Yellowstone, Montana, and the corresponding modification to KWWF's construction permit, would allow KWWF to upgrade from a Class A to a Class C facility, which upgrade would otherwise be impossible on Channel 243A. *Id.* Petersen/Alpine have identified an existing transmitter site at Sawtell Peak from which KWWF, operating on Channel 225C, would provide a significantly greater signal than if constructed at its currently authorized facilities, located in the valley floor in West Yellowstone. See BPH-941122MI. Indeed, operation of KWWF on Channel 225C, as provided in Petersen/Alpine's Counterproposal, would provide service to over 40,000 people within an approximate 26,170 square kilometer radius, compared to KWWF's presently authorized facility that would provide service to just 998 people within approximately 1,000 square kilometers. *Id.* at 2. Moreover, substitution of Channel 225C pursuant to Petersen/Alpine's Counterproposal would fully comply with the Commission's minimum separation requirements of Section 73.207, and would provide requisite city-grade coverage of West Yellowstone, Montana, pursuant to Section 73.315 of the Commission's Rules. *Id.*

Finally, Petersen/Alpine's Counterproposal would ensure that the Ashton, Idaho community will receive its first local aural transmission service, thereby serving the highest of the Commission's existing allocation priorities.³

Accordingly, Petersen/Alpine's Counterproposal would result in a net service benefit to the West Yellowstone, Montana and Ashton, Idaho communities, and will best serve the Commission's allocation priorities and the public interest.

If the Commission amends the FM Table of Allotments pursuant to Petersen/Alpine's Counterproposal as requested herein, Petersen/Alpine will promptly file an application for modification of its construction permit, construct the modified facilities following grant of the application, place those facilities in operation, and will seek a license covering the West Yellowstone facility.⁴

III. Conclusion.

For the reasons stated above, the public interest will be served by the adoption of Petersen/Alpine's Counterproposal. Accordingly, in lieu of the

³ *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

⁴ Petersen/Alpine's Counterproposal constitutes an "incompatible channel swap" as Channel 243A cannot be utilized at Ashton, ID unless Channel 225C is substituted for Channel 243A in West Yellowstone and under this scenario, only the licensee in West Yellowstone would be able to use Channel 225C. Accordingly, Petersen/Alpine's Counterproposal creates a mutually exclusive relationship as contemplated by Section 1.430(g)(3) of the Commission's Rules, and therefore Channel 225C in West Yellowstone is exempt from the consideration of competing expressions of interest. See *Modification of FM Broadcast Licenses to Higher Class Co-Channels or Adjacent Channels*, 60 RR 3d 114, 120 (1986).

Commission's proposed amendment to the FM Table of Allotments as set forth in the NPRM, Petersen/Alpine respectfully request that the Commission amend the FM Table of Allotments as follows:

City	Present Allotment	Proposed Allotment
Ashton, Idaho	-----	243A
West Yellowstone, Montana	243A	225C

Moreover, Petersen/Alpine respectfully requests that the Commission modify the construction permit of KWWF to specify Channel 225C and the transmitter site at Sawtell Peak as its authorized facility.

Respectfully submitted,

GARY N. PETERSEN

By: F. Joseph Brinig by ap
F. Joseph Brinig
1427 Dolley Madison Boulevard
McLean, VA 22101
His Attorney

ALPINE BROADCASTING
LIMITED PARTNERSHIP

By: Theodore D. Kramer
Rafael G. Prohias
BAILEY BADER & PORRIS P.L.C.
Suite 900, 4350 North Fairfax Drive
Arlington, VA 22203-1633
Its Attorneys

November 3, 1997

EXHIBIT A
ENGINEERING STATEMENT



Broadcast Engineering Services

415 Emerald Forest Lane
Sonny Dorn, California 95360
(408)223-1571 (408)457-8099 (FAX) dmunifwell.com

Donald E. Munifwell Jr., NCR
Consulting Engineer

Engineering Statement In Support of Counter-Proposal in MM Docket 97-200

This engineering statement was prepared in support of a counter proposal filed jointly by Gary N. Petersen, permittee of KWWF, West Yellowstone, Montana and Alpine Broadcasting Ltd., approved assignee of KWWF (together Petersen and Alpine are referred to as "Petersen/Alpine"). Station KWWF is operating pursuant to construction permit BPH-941122MI, and has filed a license application (BLH-960220KB).

The Petersen/Alpine counter-proposal is as follows:

Community of License	Present	Proposed
Ashton, Idaho	-----	AD243A
West Yellowstone, Montana	243A	225C

The Notice of Proposed Rulemaking proposes to allocate Ch. 224A to Ashton, Idaho with a site restriction 9.1 km northwest. In lieu of this proposal, Petersen/Alpine propose to allocate Ch. 243A to Ashton. This allocation would remove the site restriction and would permit the substitution of Ch. 225C for Ch. 243A in West Yellowstone.

As shown in Exhibit 1, the allocation of Ch. 243A meets all of the separation requirements pursuant to Section 73.207 of the Commission's rules from the reference point for Ashton, Idaho.

The substitution of Ch. 225C for Ch. 243A in West Yellowstone will permit the upgrade of KWWF, which is otherwise not possible on it's current channel. Exhibit 2 demonstrates that this substitution from KWWF's presently authorized site satisfies all of the separation requirements of Section 73.207.

Petersen/Alpine have identified an existing electronic site at Sawtelle Peak from which the signal on Ch. 225C would provide a significantly greater signal than if built at the existing site on the valley floor in West Yellowstone. From Sawtelle Peak, an upgraded KWWF on Ch. 225C would cover approximately 26,170 square kilometers with a population of approximately 40,316, compared to the present coverage on Ch. 243A of an area encompassing 1,094 square kilometers with a population of 988 persons. As shown in Exhibit 3, Ch. 225C at Sawtelle Peak meets all separation requirements, and as shown in Exhibit 4, provides the requisite city grade coverage of West Yellowstone, Montana.

The foregoing technical statement and attached exhibits were prepared on behalf of Petersen/Alpine by Donald E. Mussell Jr. NCE, its technical consultant. All information contained herein is true and accurate to the best of his belief and knowledge. All data relating to the FM facilities is extracted from the NTIA database as updated October 25, 1997. All population figures are based on 1990 Census figures as extracted from the database maintained by Communications Data Services, Arlington, Virginia.

10-31-1997

Broadcast Engineering Services

(408) 867-8098

CEN 2438 ~ 96.3 MHz

FIGURE 1 - APPROXIMATE IDAHO COVERAGE-PHOTOPAL

PERFORMANCE CHECKS WITH 300314, MERIDIAN, ID AT N. LAT. 44° 08' 10" W. LON. 113° 38' 57"

PWR = 6 KW S.A.S.T. = 100 %

Protected F(30-30) dBm = 28.29 km

F(30-10) 40 dBm = 86.68 34 dBm = 43.74 30 dBm = 2.1 100 dBm = 2.78

F(30-10) 37 dBm = 98.21 31 dBm = 51.50 27 dBm = 10.78 27 dBm = 3.32

F(30-10) 34 dBm = 132.53 48 dBm = 59.81 74 dBm = 12.73 94 dBm = 4.03

CALL	TYPE	* TX *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PWD(km)
CITY	STATION	LIC#		-----	-----	-----	MAX(km)	COR(km)	FILE #

243C KIDZK	LI CR	96.0 K	21.8 K	232.8	136.47 km	43 28 31	100.00	42.93	83.24
Idaho Falls	ID	Simpsons Family, Inc.		92.5	72.37 mi	112 39 30		437.0	3823 81283305
243A KMMZ-C	CP CR	115.0 K	-49.0 K	30.3	86.09 km	44 38 56	6.00	68.31	15.75
West Yellowstone	MT	Gary R. Petersen		210.3	61.82 mi	111 05 30		~82.0	2102 88884112283
243C2 KQKV	LI CR	166.0 K	79.8 K	332.7	245.78 km	46 06 03	10.50	126.25	52.18
Deer Lodge	MT	Robert Cummings Radio		358.7	152.72 mi	112 57 00		396.0	2815 86397650363
244C2 KECI	LI CR	186.0 K	72.4 K	16.7	178.86 km	45 40 24	8.00	64.86	43.83
Belgrade	MT	Gilbert Broadcasting Corp	186.7	110.82 mi	110 52 02		298.0	2078 86397682683	

PCC Comment > From Channel 244C3 per One-Step application 282-98030618

245C1 KMMZ	LI CR	75.0 K	21.9 K	160.7	96.88 km	43 27 42	50.00	39.27	67.09
Jackson	MT	Chaparral Broadcasting, Inc	320.7	60.20 mi	110 49 10		323.0	2873 812896831780	

1.f. RELATIONSHIPS:

246A AP236	AP CR	10.0 K	80.0 K	210.8	86.03 km	43 26 35	6.00	9.10	28.23
Idaho Falls	ID	Harris Broadcasting Compan	30.0	56.28 mi	112 03 20		100.0	1351 82897080788	

246A AP236	AP CR	10.0 K	80.7 K	204.4	85.89 km	43 24 06	1.00	9.10	28.63
Idaho Falls	ID	Western Communications, Inc	24.4	56.46 mi	112 00 22		176.0	1776 82897080789	

246A AP236	AP CR	10.0 K	85.4 K	204.3	85.48 km	43 23 10	3.10	9.07	28.32
Idaho Falls	ID	Barry Media	24.2	56.28 mi	112 00 03		138.0	1743 82897080788	

246A AL2028	AL S	10.0 K	77.7 K	210.4	87.88 km	43 27 31	6.00	9.10	28.29
Idaho Falls	ID	27-14	80.0	54.47 mi	112 04 03		100.0	0	

PCC Comment > Site Restriction 4.0km Southwest-Effective 7-7-97 per 097-14

246A AP236	AP CR	10.0 K	82.6 K	204.2	86.46 km	43 21 10	3.10	9.07	28.13
Idaho Falls	ID	BAB Broadcasting Co., Inc	24.2	56.28 mi	112 00 03		139.0	1783 82897080788	

246A AP236	AP CR	10.0 K	83.7 K	204.4	86.88 km	43 21 06	3.00	9.01	28.23
Idaho Falls	ID	James W. Fox	24.4	56.46 mi	112 00 22		184.0	1789 82897080788	

246A AP236	AP CR	10.0 K	78.3 K	208.7	88.31 km	43 26 19	6.00	9.10	28.29
Idaho Falls	ID	Next Idaho Broadcasting Co.	38.7	54.87 mi	112 02 31		100.0	1577 82897080788	

CITY	CALL	STATION	* 33 *		BEARING	DISTANCE	LAT.	LONG.	FREQUENCY		
			STATE	LICENSER					-----	-----	MHZ (kHz)
236A	AP286	AP-CB	10.0 N	89.7 N	206.4	95.69 km	43 21 06	112 00 23	1.20	9.38	28.46
Treasure Falls		ID: Ted W. Austin, Jr.			28.4	59.46 mi			196.0	1784	898870888888
FCC Comment - Untimely filed application											
236A	AP298	AP-CB	10.0 N	81.5 N	206.8	80.97 km	43 23 49	112 00 06	8.00	4.94	15.75
Treasure Falls		ID: R&G Media			28.8	50.53 mi			-28.0	1830	898870883388
236A	AP298	AP-CB	10.0 N	80.5 N	206.8	80.48 km	43 24 08	112 00 02	8.00	4.94	15.75
Treasure Falls		ID: Ray S. Henderson 3/8/0 28			28.8	50.21 mi			-28.0	1874	898870880388
236A	AP298	AP-CB	10.0 N	78.8 N	210.4	89.79 km	43 26 48	112 04 25	8.00	9.10	28.28
Treasure Falls		ID: Interstart Broadcasting Inc			28.8	55.17 mi			189.0	1882	898870888881

10-31-1897

Broadcast Engineering Services

(408) 457-8888

C88 2280 ~ 90.3 MHz

X100002 ~ 8888 CLASS C

INTERFERENCE CHECKS WITH KMFJ-C, WBBR TELEVISION, INC AT 8. 1282 40 38 56 W. LONG. 121 08 50

PWR = 100 kW E.A.A.T. = 600 M C.G.R. = 2102 M 88886

Protected P(50-50) 60 dBu = 81.82 km

P(50-10) 40 dBu = 197.76 54 dBu = 198.37 60 dBu = 198.39 100 dBu = 13.7

P(50-10) 37 dBu = 214.38 51 dBu = 148.34 77 dBu = 88.78 97 dBu = 17.88

P(50-10) 34 dBu = 232.97 48 dBu = 160.45 74 dBu = 67.85 94 dBu = 21.44

C88	CALL	TYPE	~ 10 ~	~ 00T ~	MAXIMUM DISTANCE	LAST.	PWR(kW)	LONG(°E)	LONG(°W)
C887	888822	LIC#28888888			~-----	1208.	88888888	00888888	00888888

8888 888822 AP CM 85.0 W 38.0 N 174.9 128.96 km 83 29 34 0.54 1.63 38.29
 Victor ID Idaho Broadcasting Consort 354.8 80.13 mi 120 37 37 328.8 2683 888870813883
 FCC Comment > Longitude is out of range for the state.

8888 888822 AP CM 85.0 W 38.0 N 174.9 128.96 km 83 29 33 0.48 1.54 37.98
 Victor ID Chapparral Broadcasting, Inc 354.8 80.16 mi 120 37 16 340.8 2681 888870813883
 FCC Comment > Longitude is out of range for the state.

8888 888822 AL CM 85.0 W 23.2 N 180.8 116.18 km 83 36 12 6.00 2.73 38.29
 Victor ID 97-37 WO# 970 6.8 73.19 mi 121 08 36 100.8 0
 FCC Comment > Effective 7-14-97 per 887-37

8888 888823 AP CM 95.0 N 23.7 N 179.6 118.73 km 43 38 54 6.00 1.57 16.23
 Victor ID Michael Radio Group 388.8 72.63 mi 111 05 16 ~285.0 1993 888870813883

8888 888824 LI CM 105.0 N 50.2 N 96.2 100.17 km 44 29 48 100.00 68.93 20.47
 Powell WY Chapparral Broadcasting, Inc 278.2 98.62 mi 109 09 19 567.0 2361 888820888883

8888 888825 LI CM 105.0 N 29.2 N 325.3 184.19 km 46 00 22 4.60 28.89 37.18
 Butte MT Sunbrook Communications, Inc 189.3 114.65 mi 112 28 30 550.0 2331 88883010888C

8888 888826 LI CM 105.0 N 41.0 N 385.3 226.86 km 46 21 02 1.50 18.98 11.21
 Salmon ID Weccom, Inc. 105.2 160.98 mi 113 39 12 ~268.0 1336 88884030988A

8888 888827 AP 105.0 N ~49.0 N 818.3 86.03 km 48 08 10 6.00 43.74 38.29
 Harrison ID Mountain Tower Broadcastin 30.3 41.02 mi 113 30 57 100.0 0 0888144

FCC Comment > Site Restriction 3.1km Northwest

8888 888827 AP CM 105.0 N 29.0 N 168.2 134.84 km 83 27 48 100.00 33.92 72.61
 Jackson WY Roy S. Sanderson d/b/a Roy 348.2 83.78 mi 110 48 09 303.0 2480 88886053388A

8888 888827 AP CM 105.0 N 29.0 N 168.2 134.84 km 83 27 48 100.00 34.98 73.43
 Jackson WY Dr. John D. Zimbick 348.2 83.78 mi 110 48 09 312.0 2478 88886053388C

8888 888827 AP CM 105.0 N 29.0 N 168.2 134.84 km 83 27 48 100.00 35.18 74.17
 Jackson WY Mountaintop Enterprises of 348.2 83.78 mi 110 48 09 328.0 2476 888860533882

8888 888827 AP CM 105.0 N 29.0 N 168.2 134.84 km 83 27 48 100.00 35.30 74.87
 Jackson WY Flat Creek Development Com 348.2 83.78 mi 110 48 09 328.0 2480 88886053388D

CITY	CALL	STATION	* 28 *	* CMT *	REGIONS	REGIONS	LAT.	PWR(kW)	IMP(km)	PRO(km)
			-----	-----	-----	-----	-----	-----	-----	-----

227C KLOPEN AL W 105.0 N 27.8 W 168.3 132.83 km 43 28 43 100.00 38.39 71.82
Jackson WT 95-171 90w 960 368.3 83.52 mi 110 45 43 600.0 0

FCC Comment > Effective 4-22-96

227C AP227 AP CX 105.0 N 29.8 W 168.3 134.84 km 43 27 40 100.00 38.36 74.17
Jackson WT Sally Smalley Broadcast 368.3 83.79 mi 110 45 09 324.0 2474 2228980023388

227C AP227 AP CX 105.0 N 29.8 W 168.3 134.84 km 43 27 40 100.00 38.74 73.65
Jackson WT BB Needles LLC 368.3 83.79 mi 110 45 09 317.0 2474 2228980023388

227C AP227 AP CX 105.0 N 29.8 W 168.3 134.84 km 43 27 40 100.00 38.74 73.65
Jackson WT Mount Rushmore Broadcast 368.3 83.79 mi 110 45 09 317.0 2474 2228980023388

227C AP227 AP CX 105.0 N 29.8 W 168.3 134.84 km 43 27 40 100.00 38.73 72.38
Jackson WT Ted W. Austin, Jr. 368.3 83.79 mi 110 45 09 300.0 2454 2228980023388

227C AP227 AP CX 105.0 N 29.8 W 168.3 134.84 km 43 27 40 100.00 38.49 74.47
Jackson WT On-Site, Inc. 368.3 83.79 mi 110 45 09 328.0 2480 2228980023388

227C AP227 AP CX 105.0 N 29.8 W 168.3 134.84 km 43 27 40 100.00 38.28 74.32
Jackson WT Cathedral Communications, 368.3 83.79 mi 110 45 09 326.0 2479 2228980023388

4. EMISSIONS:

278C1 KLOPEN AL W 41.0 N 73.7 W 2.3 114.66 km 45 40 47 100.00 33.87 72.31
Bozeman WT 94-26 90w 943 282.3 71.29 mi 111 02 38 299.0 0
FCC Comment > Effective 10-21-96

278C1 AP278 AP CX 41.0 N 73.4 W 4.8 118.39 km 45 41 35 100.00 18.05 48.89
Bozeman WT William Richard Beier, Jr. 384.4 72.32 mi 110 58 38 98.0 1788 2228941133N08

278C1 AP278 AP CX 41.0 N 74.3 W 9.0 119.27 km 45 40 24 100.00 28.87 65.39
Bozeman WT Walter R. Smith & Orvyn L. 389.0 73.63 mi 110 52 04 217.0 2068 2228941133N08

278C1 AP278 AP CX 41.0 N 68.2 W 354.6 109.21 km 45 37 38 100.00 26.34 62.00
Bozeman WT Frank E. Spain 376.6 87.86 mi 111 13 38 181.0 1781 2228941133N08

10-31-1987

Broadcast Engineering Services

(408) 457-8088

CBF 325C ~ 92.9 MHz

FIGURE 3 ~ KXPF at 6800ft PEAK

INTERFERENCE CHECKS WITH KWYX, WOLF TELEVISION, INC AT N. LADD. #4 33 39 N. LONG. 111 26 24

PWR = 68 kW S.A.A.T. = 817 ft C.O.R. = 2386 ft ASHL

Protected F(50-60) 60 dBr = 91.98 dB

F(50-10) 40 dBr = 104.39 54 dBr = 124.82 80 dBr = 99.2 100 dBr = 11.93

F(50-10) 37 dBr = 110.77 51 dBr = 123.82 77 dBr = 97.47 87 dBr = 16.32

F(50-10) 34 dBr = 109.14 48 dBr = 127.98 74 dBr = 86.9 94 dBr = 20.48

CBF CALL	STATION	• 10 •	• OUT •	BEARING DEGREES	LAT.	PWR(kW)	100(km)	100(mi)
CITY		88228	830888888	-----	-----	88228(kW)	100(km)	100(mi)

222A ALOPES AD 8 95.0 N 18.6 W 186.0 108.63 km 43 38 12 6.00 2.75 28.89

Victor ID 97-37 WNo 970 346.0 68.11 mi 111 06 36 100.0 0

FCC Comment > Effective 7-14-87 per 997-37

222A AP2222 AD CR 95.0 N 29.9 W 161.0 124.92 km 43 28 33 0.48 1.84 27.89

Victor ID Chaparral Broadcasting, Inc 341.0 77.82 mi 110 57 16 340.0 2851 8P8870813488

FCC Comment > Longitude is out of range for the state.

222A AP2222 AD CR 95.0 N 18.6 W 169.2 110.81 km 43 35 34 6.00 1.87 28.79

Victor ID Michael Radio Group 348.2 68.73 mi 111 05 16 ~200.0 1983 8P8870813488

222A AP2222 AD CR 95.0 N 29.9 W 161.0 124.89 km 43 28 34 0.54 1.63 28.29

Victor ID Idaho Broadcasting Consort 341.0 77.80 mi 110 57 17 328.0 2843 8P8870813488

FCC Comment > Longitude is out of range for the state.

223C KLYX AD CR 103.0 N 78.8 W 98.2 181.76 km 44 29 48 100.00 48.98 90.47

Bozeman WY Chaparral Broadcasting, Inc 372.2 112.84 mi 109 39 19 867.0 2861 8L88830520880

223C1 KXAR AD CR 103.0 N 78.0 W 394.0 279.03 km 48 00 29 6.00 20.99 97.18

Butte WY Sunbeam Communications, Inc 194.0 111.23 mi 112 28 30 866.0 2831 8L88958108880

224A AP2224 AD 169.0 N ~117.4 W 187.3 67.58 km 44 08 10 6.00 43.74 28.29

Bozeman ID Mountain Power Broadcastin 7.3 39.56 mi 111 38 57 100.0 0 888346

FCC Comment > Site Restriction 9.1km Northwest

225A KSRKZB AD CR 103.0 N 39.1 W 289.0 284.13 km 48 11 02 1.50 18.99 11.21

Salmon ID Welcome, Inc. 103.0 128.84 mi 113 53 18 ~268.0 1336 8L88840305880

227C AP2237 AD CR 103.0 N 39.1 W 168.7 134.85 km 43 27 40 100.00 38.74 73.88

Jackson WY Mount Rushmore Broadcastin 335.7 83.29 mi 110 45 09 317.0 2474 8P88960333880

227C AP2237 AD CR 103.0 N 39.1 W 168.7 134.85 km 43 27 40 100.00 33.91 72.61

Jackson WY Roy E. Henderson d/b/a KSS 335.7 83.29 mi 110 45 09 303.0 2480 8P88960333880

227C AP2237 AD CR 103.0 N 39.1 W 168.7 134.85 km 43 27 40 100.00 35.38 76.32

Jackson WY Cathedral Communications, Inc 335.7 83.29 mi 110 45 09 306.0 2479 8P88960333880

227C ALOPES AD 8 103.0 N 29.0 W 158.7 132.90 km 43 28 42 100.00 50.39 91.88

Jackson WY 86-171 WNo 960 335.7 83.02 mi 110 45 42 600.0 0

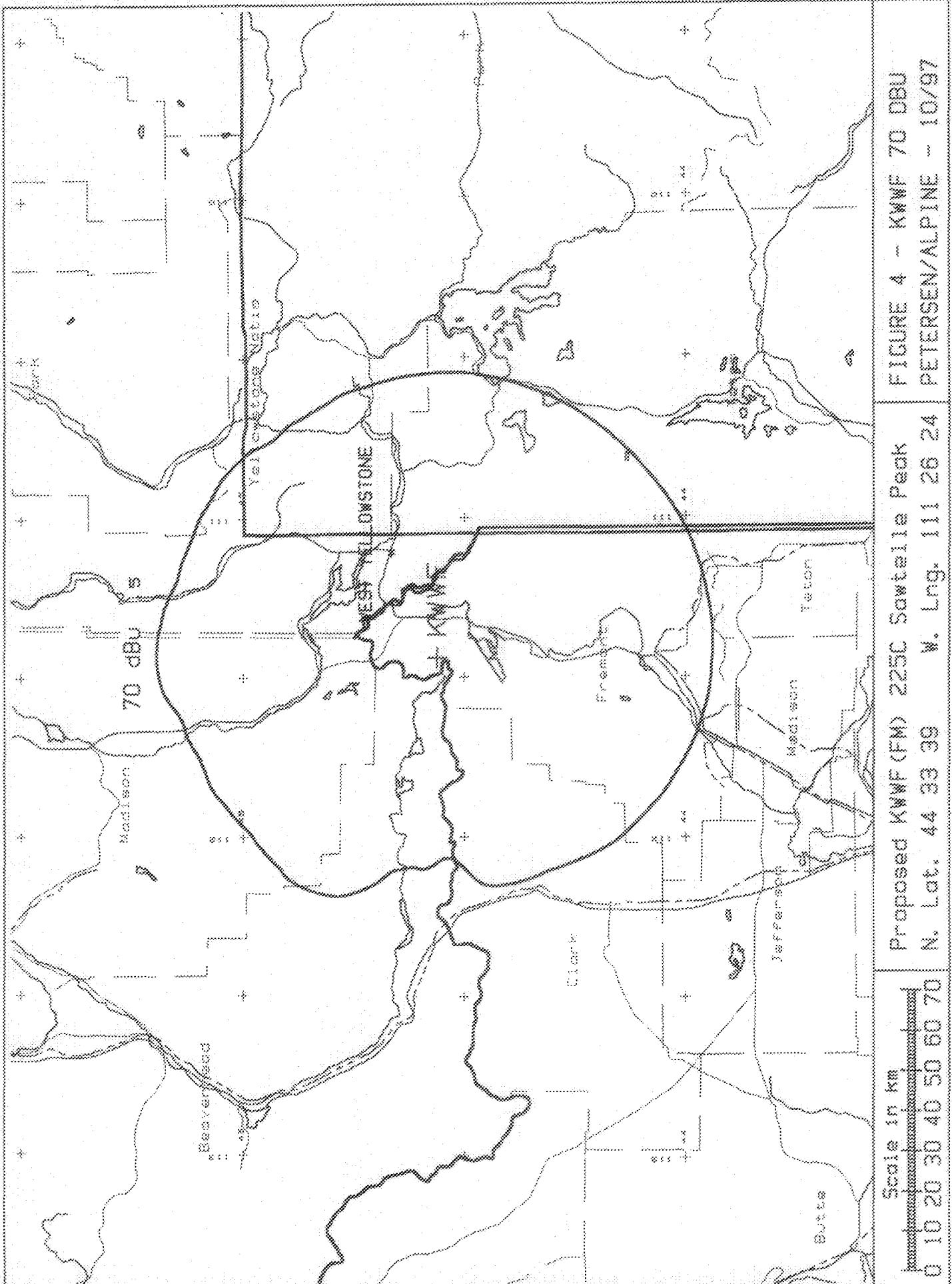
CIR#	CALL	TYPE	X IN		X OUT		BEARING	DISTANCE	LAT.	LONG.	PMR(km)	INT(km)	PRO(km)
			STATE	LATITUDE	STATE	LATITUDE							

FCC Comment > Effective 6-22-96

227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	33.40	74.47
Jackson		WT	Flat Creek Development Corp			155.7	83.29 mi	110 48 09		328.0	2483 898860923380
227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	34.74	73.83
Jackson		WT	KB Needles LLC			155.7	83.29 mi	110 48 09		317.0	2474 898860923380
227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	33.73	72.38
Jackson		WT	Ted W. Austin, Jr.			155.7	83.29 mi	110 48 09		300.0	2454 898860922380
227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	35.16	74.17
Jackson		WT	Sally Smalley Dilascio			155.7	83.29 mi	110 48 09		324.0	2483 898860923380
227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	34.56	73.43
Jackson		WT	Dr. John D. Simbrick			155.7	83.29 mi	110 48 09		314.0	2474 898860923380
227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	35.16	74.17
Jackson		WT	Mountaintop Enterprises of			155.7	83.29 mi	110 48 09		324.0	2474 898860923380
227C	AP227	AP	CW	105.0 N	39.1 W	155.7	134.05 km	43 27 40	100.00	33.40	74.47
Jackson		WT	Co-Gill, Inc.			155.7	83.29 mi	110 48 09		300.0	2454 898860923380

4.4. EXPLANATION(S) :

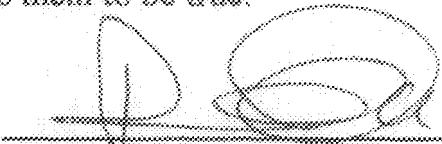
278C1	AP278	AP	CW	41.0 N	89.0 W	166.0	130.87 km	45 43 28	100.00	18.03	68.89	
Bozeman		WT	William Richard Seier, Jr.			166.0	81.32 mi	110 58 58		200.0	1763 898841321800	
278C1	AP278	AL	N	41.0 N	87.3 W	167.3	128.31 km	45 48 47	100.00	33.67	72.31	
Bozeman		WT	24-24			167.3	81.23 mi	111 02 16		328.0	0	
FCC Comment > Effective 10-21-94												
278C1	AP278	AP	CW	41.0 N	78.7 W	168.0	119.89 km	45 37 38	100.00	36.34	63.00	
Bozeman		WT	Frank E. Spain			168.0	74.37 mi	111 13 38		381.0	1763 898841321800	
278C1	AP278	AP	CW	41.0 N	90.6 W	169.0	133.58 km	45 40 34	100.00	36.67	63.39	
Bozeman		WT	Walter H. Smith & Sons L.			169.0	81.76 mi	110 58 04		217.0	3083 898841321800	



**AFFIDAVIT AND QUALIFICATIONS OF
DONALD E. MUSSELL JR.**

State of California)
Bonny Doon)
County of Santa Cruz)

Donald E. Mussell Jr. affirms that he is a consulting radio and electronics engineer; that he is Certified as a Broadcast Engineer, Class 1, by the National Association of Radio and Telecommunications Engineers, Inc.; That he is recognized as a Broadcast Technologist by the Society of Broadcast Engineers; That he held a First Class Radiotelephone License from 1975 until 1985, when it was replaced by a lifetime General Class Radiotelephone license (PG-12-20388), issued by the Federal Communications Commission in January of 1985; that the foregoing report was prepared by him or under his direction; and that the statements contained therein are true to his own personal knowledge except those stated to be on information and belief, and as to those statements, he verily believes them to be true.

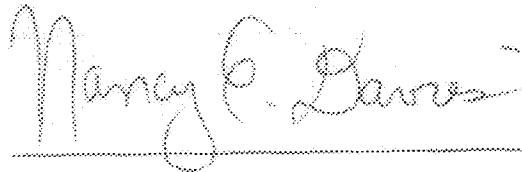


Donald E. Mussell Jr. NCE
October 31, 1997

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley Bader & Potts P.L.C., hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

Victor A. Michael, Jr.
President, Mountain Tower Broadcasting
c/o Magic City Media
1912 Capitol Avenue, Suite 300
Cheyenne, WY 82001

A handwritten signature in cursive ink, appearing to read "Nancy E. Davis". It is written over a horizontal line.

November 3, 1997